

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

TIMOTHY R. FLAHERTY,

Defendant.

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CRIM. NO. 15-10127-MLW

GOVERNMENT'S MOTION FOR LEAVE TO FILE LATE ITS RESPONSE TO  
DEFENDANT'S MOTION FOR SUPPLEMENTARY DISCOVERY

The United States hereby requests leave of the Court to file late its Response to Defendant's Motion For Supplementary Discovery. As grounds therefor, the government submits that due to scheduled vacations of government counsel and participation and preparation for the Pan Mass Challenge, government counsel were unable to prepare an adequate response until this date.

Counsel for the defendant does not oppose this motion, and it is hoped that the late filing would not unduly inconvenience the Court in relation to the hearing scheduled for August 19, 2015.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: S. Theodore Merritt  
ROBERT A. FISHER  
S. THEODORE MERRITT  
Assistant U.S. Attorneys

Date: August 12, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ S. Theodore Merritt

S. Theodore Merritt

Assistant United States Attorney